

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN PRODUCTS
LIABILITY LITIGATION

THIS DOCUMENT RELATES TO ALL
CASES

MDL No. 2875

Civil Case No. 19:2875 (RBK/JS)

**NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE AS TO PERIPHERAL
DEFENDANT PREFERRED PHARMACEUTICALS, INC.**

WHEREAS the Court entered Case Management Order No. 15, which provides a mechanism for certain defendants to obtain a without prejudice dismissal from all cases pending in this MDL alleging claims in connection with allegedly contaminated valsartan-containing drugs ("VCDs");

WHEREAS, Peripheral Defendant Preferred Pharmaceuticals, Inc. ("PPI") having provided the information and documents required by Case Management Order No. 15, and having agreed to the tolling provisions therein;

IT IS HEREBY STIPULATED AND AGREED between Plaintiffs Executive Committee and PPI that all current cases pending and all future cases to be filed in this MDL alleging claims against PPI in connection with allegedly contaminated VCDs be and hereby are dismissed without prejudice.

/s/ Marlene J. Goldenberg
Marlene J. Goldenberg
(MN Bar ID: 0394943)
GOLDENBERGLAW, PLLC
mjgoldenberg@goldenberglaw.com
800 LaSalle Avenue, Suite 2150
Minneapolis, MN 55402
Tel.: (612) 333-4662
Fax: (612) 367-8107
On behalf of the Plaintiffs Executive Committee

Dated: August 5, 2020

/s/ Kelly A. Waters
Kelly A. Waters
(NJ Bar ID: 030301991)
WOOD SMITH HENNING & BERMAN, LLP
400 Connell Drive, Suite 1100
Berkeley Heights, New Jersey 07922
973-265-9914
kwaters@wshblaw.com

Attorneys for Peripheral Defendant,
Preferred Pharmaceuticals, Inc.

Dated: July 21, 2020